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December 22, 2015

Hon. Jesse M. Furman  
United States District Court, Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, New York 10007

Re: USA ex rel Tessler/Gonzalez v. The City of New York  
Civil Action No.14-6455(JMF)  
Letter-Motion For Extension of Time to File an Amended Complaint or Submit  
Opposition Papers to Defendant's Motion To Dismiss

Honorable Sir:

In accordance with Rule 1E of this Court's Individual Rules and Practices For Civil Cases, Plaintiffs respectfully submit this letter-motion requesting the extension of time to file an amended complaint or submit opposition to Defendant's Motion To Dismiss. I have conferred with counsel for Defendant City of New York and they have consented to this request.

On December 14, 2015, the Court issued an order directing Plaintiffs to either file any amended complaint or submit their opposition to Defendant's Motion To Dismiss by December 28, 2015. Defendants were given until January 4, 2016 to reply to the Plaintiff's opposition, file its answer or file a new motion to dismiss.

The above order permitted the parties to request reasonable extensions of the above deadlines in light of the holiday season. The order further directed counsel to confer and jointly purpose modified dates.

I have conferred with counsel for Plaintiff Gonzlalez and Defendant City of New York today. The parties have agreed to request an extension until February 1, 2016 for Plaintiffs to file an amended complaint or submit their opposition to Defendant's Motion To Dismiss. In addition, the parties have agreed that in the event that Plaintiffs file an amended complaint or submit opposition to Defendant's Motion To Dismiss, Defendant will have until February 29, 2016 to file an answer, file a new motion to dismiss or inform the court that it will rely on its previously filed motion to dismiss.

Plaintiffs seek the extension of the deadline to amend the complaint or oppose Defendant's Motion To Dismiss for the purpose of meeting and conferring with our clients in order to prepare an amended complaint or opposition papers to Defendant's Motion To Dismiss.

The parties have not made a previous request for an extension of time to comply with the Court's December 14, 2015 Order. The court previously granted Defendant's motion, on consent, to extend its time to file its answer or make a motion to dismiss for sixty days.

The initial pretrial conference was scheduled on December 21, 2015. The Court, in its December 14, 2015 Order, adjourned the conference *sine die*.

Plaintiffs respectfully request that the court grant this motion to extend the deadlines set forth in its December 14, 2015 Order to the dates consented to by all parties in this action.

If the Court has any questions or concerns, we are ready to discuss them at anytime which is convenient to the Court

Thank you for the Court's time and courtesy in considering this letter-motion.

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Cc: Counsel of Record